

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

RICHARD AND KAYCE R. GREGORY
a/ka KAYCE R. CAMPBELL
Debtors

Chapter 13

Case No. 1:17-bk-01866

**DEBTOR'S RESPONSE TO PACIFIC UNION FINANCIAL' S MOTION FOR
RECONSIDERATION OF COURT ORDER**

AND NOW, this 29th day of June 2018, come the Debtors, Richard E. Gregory, Jr. and Kayce R. Gregory, by and through counsel, CGA Law Firm, Brent C. Diefenderfer, Esquire, and do here by files the following Response to Pacific Union Financial' s Motion for Reconsideration pf Court Order and in support thereof states as follows:

1. Local Rule 7.10 requires that “any motion for reconsideration or re-argument must be accompanied by a supporting brief and filed within fourteen (14) days after the entry of the order concerned.” (Based upon the failure to file a Brief as prescribed by the Local Rule, the document styled as a Motion for Reconsideration is legally insufficient.)

2. Pacific Union has not plead any intervening change in the controlling law, the emergence of new evidence not previously available or the need to correct a clear error of law or to prevent a manifest injustice. Mere dissatisfaction with the Court's ruling is not a proper basis for reconsideration. See United States v. Phillips, 2001 WL 527810, at 1 (E.D. PA May 17, 2001) (citing Burger King Corporation v. New England Hood and Duct Cleaning Company, 2000 WL 133756 at 2 (E.D. PA Feb. 4, 2000)).

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WHEREFORE, the Debtors request that the Court deny the Motion for Reconsideration.

Respectfully submitted,

/s/Brent C. Diefenderfer
Brent C. Diefenderfer
Sup. Ct. I.D. No. 93685
135 North George Street
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(717) 848-4900
Counsel for Debtors

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2018, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which sent notification of such filing to the following Filing Users:

James C. Warmbrodt, Esq. KML Law Group 701 Market Street, Suite 5000 Philadelphia, Pennsylvania 19106-1532	Charles J. Dehart, III, Esquire 8125 Adams Drive Suite A Hummelstown, PA 17306
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Respectfully submitted,
/s/Brent C. Diefenderfer
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